UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANDERSON NEWS, L.L.C. and LLOYD WHITAKER, as the Assignee under an Assignment for the Benefit of Creditors for Anderson Services, L.L.C.,

Plaintiffs,

- against -

AMERICAN MEDIA, INC., BAUER PUBLISHING CO., L.P., CURTIS CIRCULATION COMPANY, DISTRIBUTION SERVICES, INC., HACHETTE FILIPACCHI MEDIA U.S., INC., HEARST COMMUNICATIONS, INC., HUDSON NEWS DISTRIBUTORS LLC, KABLE DISTRIBUTION SERVICES, INC., RODALE, INC., TIME INC., and TIME/WARNER RETAIL SALES & MARKETING, INC.,

Defendants.

AMERICAN MEDIA, INC., HEARST COMMUNICATIONS, INC., and TIME INC.,

Counterclaim-Plaintiffs,

- against -

ANDERSON NEWS, L.L.C. and CHARLES ANDERSON, JR.,

Counterclaim-Defendants.

09 Civ. 2227 (PAC)

Filed Under Seal

COUNTERCLAIM-DEFENDANTS' RESPONSE TO COUNTERCLAIM-PLAINTIFFS' STATEMENT OF ADDITIONAL FACTS PURSUANT TO LOCAL CIVIL RULE 56.1

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New York, New York

Respectfully submitted,

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